

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
VIRGIN ENTERPRISES LIMITED,	:	
	:	
Plaintiff,	:	
	:	
- against -	:	
	:	
THOMAS FRANK, VIRGIN-INVESTMENT.COM,	:	07 Civ. 6234 (LAP)
N.C. SMOL, VIRGIN-AMERICA.COM, DIRECT	:	
INFORMATION PVT LTD, VIRGINMACAU.COM,	:	ECF CASE
C3 FINANCIAL SERVICES, INC.,	:	
VIRGINMONEYUSA.COM, INTERNET EQUITY	:	<u>NOTICE OF MOTION</u>
INVESTORS, LLC, VIRGINPROPERTIES.COM,	:	
1734488 ONTARIO INC., VIRGINPROPERTIES.NET,	:	
QUENTRALL AIR CONDITIONING SERVICES, and	:	
VIRGIN-PROPERTIES.COM,	:	
	:	
Defendants.	:	
	:	
-----	X	

PLEASE TAKE NOTICE that, on the Declaration of Darcy M. Goddard, dated September 17, 2007, and Exhibits 1-5 thereto, and on all other pleadings and papers filed in this action, Plaintiff Virgin Enterprises Ltd. ("VEL") will move this Court, The Honorable Loretta A. Preska, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, Courtroom 12A, New York, New York 10007-1312, at 9:00 a.m. on October 22, 2007, for an order pursuant to Rule 55(a) of the Federal Rules of Civil Procedure entering judgment upon default of Defendant C3 Financial Services, Inc. for failure to plead or otherwise defend the above-captioned action, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
September 17, 2007

FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP

By s/Darcy M. Goddard
James W. Dabney
Darcy M. Goddard

One New York Plaza
New York, New York 10004-1980
Telephone: 212.859.8000

Attorneys for Plaintiff Virgin Enterprises Ltd.

CERTIFICATE OF SERVICE

I certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that on the 17th day of September, 2007 I caused to be served upon the following, by the methods described below, a true copy of attached Notice of Motion and Declaration of Darcy M. Goddard with exhibits.

FIRST-CLASS MAIL

C3 Financial Services Inc
1417 Allan Lane
West Chester, PA 19380

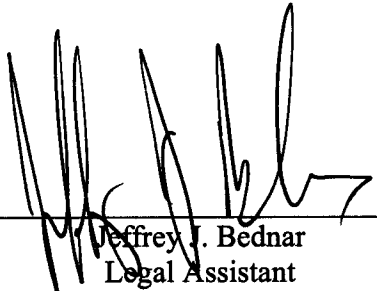
Thomas Frank
EPS-D 711
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Miami, Florida 33166-6559

AIRMAIL

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Jeffrey J. Bednar
Legal Assistant